

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

SBLI USA LIFE INSURANCE COMPANY,)	
INC., a New York corporation,)	
)	
Plaintiff,)	
)	Case No. CIV-24-820-JD
v.)	
)	
(1) SDM HOLDINGS, LLC,)	
an Oklahoma limited liability company, and)	
)	
(2) SDM HOLDINGS, LLC,)	
a Connecticut limited liability company,)	
)	
Defendants.)	

ANSWER TO COMPLAINT IN INTERPLEADER

The Receiver of Avon Capital, LLC in *Universitas Education, L.L.C. v. Nova Group, Inc.*, Case No. 14-FJ-05-HE, pending in the United States District Court for the Western District of Oklahoma, submits the following Answer on behalf of SDM Holdings, LLC, an Oklahoma Limited Liability Company (“SDM-OK”).¹

I. PARTIES²

1. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 1 and therefore denies the same.

2. SDM-OK admits the allegations of Paragraph 2.

¹ Avon Capital, LLC, a Wyoming Limited Liability Company, is the sole member of SDM-OK.

² For ease of reference only, SDM-OK utilizes the same headings utilized by the plaintiff in its Complaint.

3. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 3 and therefore denies the same.

II. JURISDICTION AND VENUE

4. The allegations in Paragraph 4 of the Complaint constitute legal statements and/or conclusions. No response is therefore required.

5. The allegations in Paragraph 5 of the Complaint constitute legal statements and/or conclusions. No response is therefore required.

III. FACTUAL BACKGROUND AND STATUTORY INTERPLEADER

6. Upon information and belief, SDM-OK admits the allegations of Paragraph 6.

7. Upon information and belief, SDM-OK admits the allegations of Paragraph 7.

8. Upon information and belief, SDM-OK admits the allegations of Paragraph 8.

9. SDM-OK admits the allegations of Paragraph 9.

8 [sic]. SDM-OK is without sufficient information to admit or deny the allegations of mis-numbered Paragraph 8.

9 [sic]. Upon information and belief, SDM-OK admits the allegations of mis-numbered Paragraph 9.

10. SDM-OK admits the allegations of Paragraph 10.

11. The Court Orders provided to the plaintiff are documents that speak for themselves, and any characterization of those Court Orders that are inconsistent with the express terms contained therein is denied.

12. The allegations in Paragraph 12 of the Complaint constitute legal statements and/or conclusions. No response is therefore required.

13. The allegations in Paragraph 13 of the Complaint constitute legal statements and/or conclusions. No response is therefore required.

14. The referenced Oklahoma Secretary of State's records are documents that speak for themselves, and any characterization of the Secretary of State's records that are inconsistent with the express terms contained therein are denied.

15. The allegations of Paragraph 15 of the Complaint constitute legal statements and/or conclusions. No response is therefore required.

16. The allegations of Paragraph 16 of the Complaint constitute legal statements and/or conclusions. No response is therefore required.

17. The allegations of Paragraph 17 of the Complaint constitute legal statements and/or conclusions. No response is therefore required.

18. The allegations in Paragraph 18 of the Complaint constitute legal statements and/or conclusions. No response is therefore required.

19. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 19.

20. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 20 and therefore denies the same.

21. SDM-OK admits the allegations of Paragraph 21.

22. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 22.

23. SDM-OK is without sufficient information to admit or deny the allegations of Paragraph 23.

All allegations not specifically admitted are denied.

WHEREFORE, having answered, the Receiver for Avon Capital, LLC, on behalf of SDM-OK, prays for relief as the Court deems appropriate under the circumstances.

Respectfully submitted,

s/ Heidi J. Long
Heidi J. Long, OBA #17667
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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2024 I electronically transmitted the attached document to the Clerk of Court using the ECF system for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF system.

s/ Heidi J. Long
Heidi J. Long